

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



October 19, 2006

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the
Lockheed Martin Moon, Mars, and Martinis Reception

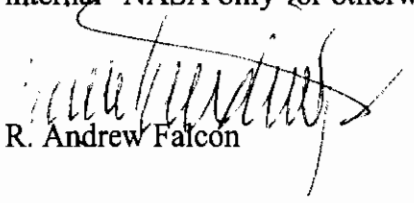
On October 24th, Lockheed Martin Corporation will host a Moon, Mars, and Martinis reception to celebrate the Orion Project and the Vision for Space Exploration. The event will take place from 6 to 8 p.m. in the 9th Floor Rotunda, 101 Constitution Ave., N.W. in Washington, DC. Lockheed Martin has invited approximately 150 people to the reception. This event will be widely attended by representatives from industry and the Executive and Legislative Branches of the U.S. Government. The estimated cost of the event, which will include food and beverages, is approximately \$40 per person. I find these events meet the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g).

I have determined that free attendance of NASA employees is in the best interests of the Agency because it will further NASA programs and operations. The events will allow NASA employees to discuss the Orion Project and the Vision for Space Exploration with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the event sponsor may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

NASA employees whose duties may substantially affect Lockheed Martin, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

The host intends to give each attendee an Orion lapel pin with an estimated value of \$2 each. Attendees are reminded of the \$20 gift exception at 5 CFR § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the pins. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

Note that NASA employees should also take care not to discuss any information that is internal "NASA only" or otherwise sensitive information, such as ongoing procurements.



R. Andrew Falcon